

REMARKS

This paper is responsive to any paper(s) indicated above, and is responsive in any other manner indicated below.

STATEMENT OF SUBSTANCE / NON-FINAL RCE FIRST OFFICE ACTION

The 31 October 2007 telephonic examiner interview (by and between Examiner Javid A. Amini and the undersigned) is respectfully noted; in such interview, it was agreed by the Examiner that if the present RCE was filed with claim amendments corresponding to those discussed during the telephonic examiner interview, then the Examiner would not make a first action final. It is respectfully submitted that the claim amendments submitted herewith correspond to those discussed during the examiner interview. The Examiner is thanked for such interview, and for allowing Applicant to avoid the procedural/administrative delays associated with an after-final amendment and advisory action process.

PENDING CLAIMS

Claims 1-20 were pending, under consideration and subjected to examination in the Office Action. Appropriate claims have been amended, canceled and/or added (without prejudice or disclaimer) in order to adjust a clarity and/or focus of Applicant's claimed invention. That is, such changes are unrelated to any prior art or scope adjustment and are simply refocused claims in which Applicant is present interested. At entry of this paper, Claims 1-20 will be pending for further consideration and examination in the application.

REJECTION UNDER 35 USC '103

All 35 USC '103 rejections are respectfully traversed. However, such rejections have been rendered obsolete by the present clarifying amendments to Applicant's claims, and accordingly, traversal arguments are not appropriate at this time. However, Applicant respectfully submits the following to preclude renewal of any such rejections against Applicant's clarified claims.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated hereat by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

One important feature of Applicant's invention is that a map generation device, comprises: an image appointment unit that receives user appointment of at least one position in a building existing **within a single image including gray-level information**, and a polygon extraction unit that extracts the building region by comparing a gray-level of the pixels, and extracts a polygon line of the building region as vector information; and a structural analysis and integration unit that integrates a boundary of the building region and lines inside the building region.

The using gray-level information is disclosed, for example, in steps 402 and 403 in Applicant's specification, and the estimating of the polygon line of the building region is disclosed, for example, in steps 403 and 405 in the specification.

According to a map generation method of Applicant's invention, an image including gray-level information which is taken by a optical sensor can be processed.

Further, the map generation method of Applicant's invention need not use plural images, but instead, is operable with a single image. That is, a single image including gray-level information does not include information which represents a direct shape of a building. Therefore, using the gray-level information is useful to estimate a region of the building for generating map.

Regarding rebuttal of the applied art, Suyoung discloses an integration method that process LADAR data. It is respectfully submitted that LADAR data does not include gray-level information. That is, the LADAR data is image data obtained by using distance measuring device emitting laser light and is a distance image representative of distances from/to a target object. Therefore, the LADAR image is different from an image including gray-level information which is used in this invention.

The applied Mac reference discloses a processing that process a stereo image, i.e., Mac does not process a single image. That is, e stereo image is a two scene picture taken by an optical sensor from differing directions. By analyzing a parallax of a stereo image, a distance image which represents a distance (depth) from a target object may be obtained. Therefore, the invention disclosed in Mac is different from Applicant's invention in view of processing target image.

Further, according to Suyoung and Mac, information on a height of a target object is obtained from the provided distance image (range image, depth image). However, according to Applicant's claimed invention, the polygon extraction unit and the structural analysis and integration unit use gray-level information to estimate outlines of the building, because height information cannot be obtained from the single image including only gray-level information.

Further, Suyoung and Mac neither disclose nor suggest generating a map without using a distance image. Accordingly, it is respectfully submitted that it is difficult to invent Applicant's invention from the cited documents.

Further, it is difficult to combine the cited documents Suyoung and Mac, because the images used in the cited documents are different from each other in view of information included in the images, and also a number of image(s) used in each.

As a result of all of the foregoing, it is respectfully submitted that the applied art (taken alone and in the Office Action combinations) would not support a '103 obviousness-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such '103 rejection, and express written allowance of all of the '103 rejected claims, are respectfully requested.

EXAMINER INVITED TO TELEPHONE

The Examiner is herein invited to telephone the undersigned attorneys at the local Washington, D.C. area telephone number of 703/312-6600 for discussing any Examiner's Amendments or other suggested actions for accelerating prosecution and moving the present application to allowance.

RESERVATION OF RIGHTS

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer. That is, any above statements, or any present amendment or cancellation of claims (all made without prejudice or

disclaimer), should not be taken as an indication or admission that any objection/rejection was valid, or as a disclaimer of any scope or subject matter. Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

CONCLUSION

This Amendment is being submitted concurrently with the filing of a Request for Continued Examination (RCE) and does not present any changes which would require further search, consideration or fees.

In view of the foregoing amendments and remarks, Applicant respectfully submits that the claims listed above as presently being under consideration in the application are now in condition for allowance.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR 1.136. Authorization is herein given to charge any shortage in the fees, including extension of time fees and excess claim fees, to Deposit Account No. 01-2135 (Case No. 1213.43404X00) and please credit any excess fees to such deposit account.

Based upon all of the foregoing, allowance of all presently-pending claims is respectfully requested.

Respectfully submitted,

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